

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DMCA Section 512(h) Subpoena to
YOUTUBE (GOOGLE, INC.)

Case No. 7:18-mc-00268 (NSR)

**REPLY DECLARATION OF MALCOLM SEYMOUR IN SUPPORT OF
MOTION TO QUASH SUBPOENA AND PROCEED ANONYMOUSLY**

I, Malcolm Seymour, under penalty of perjury declare as follows:

1. I am a principal with the law firm of Foster Garvey and counsel in this action to the anonymous John Doe movant (“Movant”).

2. I respectfully submit this reply declaration in further support of Movant’s motion (the “Motion”) (1) to quash the subpoena (the “Subpoena”) issued by order of the Court dated June 19, 2018 and (2) in the alternative, for leave to proceed anonymously.

3. Respondent Watch Tower Bible and Tract Society of Pennsylvania (“Watchtower”) has called into question some of the factual assertions made by proxy in my initial declaration in support of the Motion. I have requested clarification from the Movant regarding these disputed matters, who has provided me with further explanation and clarification.

4. I have asked Movant to reduce these explanations to a declaration of his own, which he has done. The purpose of this reply declaration is to certify that the accompanying John Doe declaration is subscribed by my client, the anonymous individual whose YouTube video is the subject of the Motion and the instant proceeding.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 10, 2020

/s/ Malcolm Seymour
Malcolm Seymour, Esq.